
Citizen Review Comments on GLOEMMP

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Sat, Aug 17, 2019 at 4:30 PM

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DOCUMENT:

**Globeville Landing Outfall Environmental Monitoring and Maintenance Plan for the Vasquez Boulevard/Interstate 70 Site Operable Unit 2,
Denver, Colorado, DRAFT, November 2018**

Prepared for:

City and County of Denver
Denver Department of Public Health and Environment
Environmental Quality Division

Prepared by:

Loop Environmental Consulting, LLC

Dated:

November, 2018

Reviewer:

Adrian Brown P.E.
Adrian Brown Consultants, Inc.

REVIEW COMMENTS:

A. Groundwater monitoring (Table A):

The proposed action if the groundwater level under the liner exceeds safe levels is (Table A):

Document conditions. Notify EPA, as appropriate. Confirm groundwater elevations when an elevation level of 3.3 feet above the liner is reached. Consult liner expert following confirmation should groundwater elevations remain at or above 3.3 feet.

The remedy must be to reduce groundwater levels to safe values, immediately.

B: Land Survey (Table A):

Action is triggered by a settlement of 2" or more. This is a large settlement for a critical structure like GLO, particularly if it is differential settlement. Any large flood would likely destroy the settled area resulting in catastrophic failure of the structure and its liner. Require trigger of maximum 1" total settlement over project life, and maximum differential settlement of 1/4" between any adjacent project structures or structure components. Action must be to repair settlement to remove or prevent access of flood water under slabs, walls, or any other liner cover or protection.

C: Vegetation Survey (Table A):

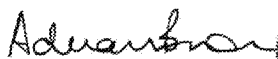
The plan calls for consultation with a liner expert if a failure of the liner is found. This is unacceptable: the liner should be required to be repaired, immediately.

D: Preventive maintenance (Section IV, B):

The plan proposes that *"Immediate and appropriate action will be taken to evaluate, minimize and/or repair any occurrence which the Project Manager believes may have compromised the integrity of the liner system."*

This action is appropriate, but placing the decision in the hands of the project manager is unreliable, as he/she may be unwilling to report conditions that indicate that they have not been doing their job properly. This is the equivalent in (for example) a mining context of placing the reporting and action responsibility in the hands of the mine manager, which is never allowed by the cognizant environmental agencies. The inspections of the site condition should be performed by qualified independent professionals not associated with the facility owner (in this case CCD), nor the organizations that constructed the facility. Examples of more appropriate independent damage inspection agents would be EPA or CDPHE.

Respectfully submitted,





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